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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

CLEAN CARE TECHNOLOGIES, INC.,
EDWARD KLEIN, AL NAZON and
ANIL VARUGHESE,

Defendants,

and

CLEAN CARE SYSTEMS, LLC,

Relief Defendant.
-----X

08 Civ. 1719 (HB)
ECF CASE

**NOTICE OF PLAINTIFF'S MOTION FOR JUDGMENT BY DEFAULT AS TO
DEFENDANT CLEAN CARE TECHNOLOGIES, INC.**

PLEASE TAKE NOTICE that upon the basis of the accompanying
Memorandum of Law in Support of Plaintiff's Motion For Default Judgment As To
Defendant Clean Care Technologies, Inc; the concurrently-filed Declaration of Teresa A.
Rodriguez, and the exhibits thereto; the Statement of Damages, and the exhibits thereto;

and all prior proceedings in this action, plaintiff Securities and Exchange Commission (the "Commission") will move this Court before Honorable Harold Baer, Jr., at the United States Courthouse, 500 Pearl Street, New York New York 10007, for a judgment of default against Clean Care Technologies, Inc. ("CCT"), due to CCT's failure to answer, respond or otherwise defend the Complaint in this action. In addition to the default judgment, and in accordance with the relief requested in the Commission's Complaint, the Commission will request that the Court enter an order: (1) permanently enjoining CCT from future violations of the federal securities laws; (2) permanently barring CCT from participating in an offering of penny stock; (3) ordering CCT to disgorge its illegally-obtained gains (plus pre-judgment interest thereon); and (4) ordering CCT to pay a civil monetary penalty.

Respectfully submitted,

By:



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New York, New York
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